SBC COMMUNICATIONS INC.,	:	
SBC DELAWARE INC.,	:	
AMERITECH CORPORATION,	:	
ILLINOIS BELL TELEPHONE COMPANY	:	
d/b/a AMERITECH ILLINOIS, and	:	
AMERITECH ILLLINOIS METRO, INC.	:	
	:	98-0555
Joint Application for approval of the	:	
reorganization of Illinois Bell Telephone	:	
Company d/b/a Ameritech Illinois, and the	:	
reorganization of Ameritech Illinois Metro,	:	
Inc. in accordance with Section 7-204 of the	:	
Public Utilities Act and for all other	:	
appropriate relief.	:	

Comments of CoreComm Illinois Regarding SBC/Ameritech's
Plan of Record for OSS Interfaces and Processes.

Pursuant to Condition 29 of the September 23, 1999 Order of the Illinois

Commerce Commission (Commission) in the above captioned proceeding, CoreComm

Illinois Inc., (CoreComm) respectfully submits its comments concerning the Plan of

Record made publicly available by SBC/Ameritech on January 7, 2000.

CoreComm is a facilities-based telecommunications provider in Illinois, and, as

such purchases unbundled network elements (UNEs) and services for resale from

Ameritech Illinois. CoreComm currently has considerable experience in providing

facilities-based service to residential customers in Ohio, and expects to begin

provisioning both residential and business customers on a facilities basis in Illinois in the

very near future. As a "start-up" facilities-based competitor to Ameritech Illinois,

CoreComm views the effective *and meaningful* implementation Condition 29 as a critical

to the development of residential competition in Illinois. The following comments are

not intended to constitute an exhaustive list of CoreComm's criticisms of the Plan of

Record. CoreComm reserves its right to raise additional issues within the collaborative

process. The following comments constitutes the list of major issues identified by

CoreComm within the timeframe provided by the Commission's Order.

General Comments

As an initial observation, the issue of third-party testing should be addressed

within the OSS collaborative process. SBC/Ameritech's Plan of record makes no mention

of third-party testing, as did the corresponding Ohio OSS Implementation Plan, issued on

January 6, 2000. An SBC/Ameritech proposal for third party testing should be included

in the Plan of Record as a starting point for discussions within the collaborative process.

Also, the Plan of Record does not address the subject of an OSS process for hot

cuts. In the Ohio OSS collaborative, the CLECs requested that SBC/Ameritech import

the hot cut process available in the Pac Bell region. An improved hot cut process is

essential to CLEC's in the Ameritech region and the subject should be addressed in the

context of the OSS collaborative in Illinois.

The Plan of record omits any reference to the support for ordering complex

business products. Currently, Ameritech's Ordering interface does not support an

electronic order format for complex business products such as "NEW" Centrex. LSR

forms for the complex business products. SBC/Ameritech should have an OBF standard

or GUI interface to order such complex products until such time an OBF LSR standard is

created, if one does not exist.

The Plan of Record does not address the need for "true" OBF and TCIF compliant implementations. An example of a non-standard implementation of the OBF standard is demonstrated by the current "best practice" of the SBC operating regions using the LSOG 3 OBF standards for ordering , but using the X12 3072 version of the EDI standard. The published ATIS standard shows LSOG3 with X12 4010. There should be a standard implementation of the OBF and TCIF guidelines as documented by ATIS to utilize the prescribed data elements per the LSR ordering rule standards and electronically interfacing using the X12 EDI standard as presented by TCIF for the corresponding OBF LSOG release.

The Plan of record includes no mention in either the PMO or FMO of whether the existing 836 PIC / LPIC change notification process, as well as the process for local line loss notification will be included or excluded. This information is important to CLECs like CoreComm to understand it's future behavior within the SBC best practices.

SBC/Ameritech's 12 month view for suggested OSS changes should be included in the Illinois Plan of Record. Attached hereto, as Appendix A, is a copy of Ameritech Identified Changes, covering 2000, distributed at the December CLEC Forum in Chicago.

Also, the Plan of Record should address the ordering of directory listings. CLECs like CoreComm would like to order the service and the listing both on one electronic order. Currently CoreComm is ordering the service via EDI to AIIS and the directory listing is faxed to AADS, once CoreComm has received a FOC and a service order number from AIIS on a EDI 850 purchase order.

Comments on Specific Provisions

Concerning Section II.A., in the discussion of EDI message flow, SBC/Ameritech should clarify whether the reference to "864 transaction" should actually be a reference to an "865" transaction.

In Section II.A., Pre-Ordering – Pending Order Status Inquiry, no mention is made in the PMO of a CLEC's need to check TCNET for the new 869/870 Status Request and Status Report transactions. This process should be addressed in the Plan of Record.

Regarding Section II.B., an important issue concerning versions of PONS was not addressed in the process flow. Ameritech can not send a transaction to the CLEC on a PON version that has already been transmitted. When Ameritech rejects an order in error. They can not adjust that specific order to make corrections. They create a new order, attach the same PON with a version in the 9000 range. This does not match the CLEC system and every one of these falls to manual within CLEC organizations. This also skews the measurements. The LEC appears to be on time with a response (rejection) to the CLEC. When they open another order – an additional order is tagged to the CLEC (it should not be) and this order is open, worked and transmitted back to the CLEC within a short time period (again skewing the measurements). This type of order should be reopened at Ameritech, re-worked without inflating the order numbers, having a receive date/time of the initial order receive date/time and an end time of the corrected order transmission back to the CLEC. The time should span the time Ameritech initially got the order to the time it was sent back correctly to the CLEC. This way, Ameritech will take steps to correct the errors both made by their service reps and their system.

In Section II.B., Ordering – Available Interfaces – 836 Transactions, this paragraph should identify both "loss of local" and "loss of LD" transactions.

In Section II.B., Ordering – Available Interfaces, the table summarizing EDI transaction usage should be modified to included unsolicited 865 transactions. A list of unsolicited 865 transactions, as identified by Ameritech at the November CLEC forum in Chicago, is attached hereto as Appendix B.

Regarding Section II.B., Ordering Message Flows, currently , for Ameritech Illinois, the 860 transaction allows a CLEC to submit a change (supplement) to an original purchase order by providing the "changed information" only, *or* by providing a full refresh of the original purchase order by indicating which details have *not* changed. This is documented in the Ameritech ESOG on TCNET for transaction 860 Purchase Order Change Request. CoreComm request that the capability of doing a Change using either a method of "full refresh" or "changes only" is supported in the improved OSS.

Also in this section, the first sentence of the fifth paragraph should be changed to state that "In Ameritech Illinois an UNSOLICITED 865 transaction is **. . . .**" In addition, unsolicited 865 transactions should be identified in detail in the Plan of Record.

In Section II.C., Provisioning – Jeopardy Notification, the PMO should reference the use of the unsolicited 865 for certain jeopardy situations. The PMO should indicate that the use of the UNSOLICITED 865 transaction is used for situations that are, in reality, jeopardies. Ameritech is sending the unsolicited 865 when an engineer identifies that there are no facilities for the pending order prior to the due date. The engineer changes the due date with this transaction. Since it is a facility delay, this should be an 870. In addition, the nature of the transaction being unsolicited is one problem in that the

CLEC community cannot provide proper customer service due to due date changes or telephone number changes. The other concern relates to the performance levels not being met. An example of this concern is where a due date or phone number change causes the order to be re-worked and further delays the customer expected service date. This re-starts the clock on the performance measurement for the transaction.

In Section II.D., Maintenance and Repair, It appears that MLT testing is only available for a loop/port combination. It is unclear why a loop cannot have MLT testing in the absence of a port.

In Section II. E., Billing – Exchange Message Interface, the Plan of Record identifies changes that will be needed to billing OSS. However, billing OSS has been excluded from the uniform 13-state CMP collaborative process. Billing OSS needs to be either included in the 13 state CMP, or identified as a separate billing OSS forum. It must be specifically stated *somewhere*. As things currently stand, it is addressed nowhere.

In Section III.A., Pre-Ordering, SBC/Ameritech should clarify whether CORBA will be available as an alternative to EDI, or whether CORBA will be made mandatory.

In Section III.A., Address Verification, the WTN function is listed to be available for residential services only. The address validation for WTN in business services should be on-line. The existing data file is not a complete validation of the address. CoreComm requests that a business WTN address validation be included on the FMO. This feature is necessary for the provisioning of business services as well as residential services; SBC/Ameritech should commit to provide this feature for business services in addition to residential services.

In Section III.A., Digital Subscriber Loop Pre-qualification Inquiry, as well as Digital Subscriber Loop Qualification Inquiry are completely inadequate. In both Ohio and Illinois the CLECs have been very specific on their requirements for the pre-qualification of loops, and thus far SBC/Ameritech has been unresponsive. At a minimum, SBC/Ameritech should provide the number of DSL capable loops in a service area . This is a major problem for CLECs, and a major shortcoming of the Plan of Record.

Concerning Section III.A., Preordering – Dispatch Inquiry, since the PMO handles only the residential accounts, the Plan of Record should be clarified to indicate whether the FMO, available in March 2001 be expanded to handle the business services? CoreComm requests that when this functionality is available in the Ameritech region, it includes dispatch inquiry for business service.

In Section III.B., Ordering, there is no information concerning a proposed schedule for implementation. CoreComm is concerned about the EDI Message flow changes and whether or not adequate time will be provided to review and make requests of SBC based on their POR filing to the FCC. A dramatic change in the EDI message flow would require a significant amount of time an effort on the part of CLECs to keep their ordering programs compatible with the changed EDI message flow.

Also, it is expected that the Electronic Message Flow in the FMO includes the 855 Purchase Order Advise, or comparable transaction, to facilitate a firm order confirmation of loop orders where more than 50 loops are requested. SBC/Ameritech should clarify this point in the Plan of Record.

Regarding Section III.C., Provisioning – Posted Order Status,   SBC/Ameritech should provide this function. Particularly with the poor quality of order processing being experience by CLEC in the Ameritech region, this feature would help CLECs greatly. Currently Ameritech does not perform a quality check between what was ordered and what was delivered. This creates a problem with Ameritech's billing to CoreComm plus a provisioning problem on future MACs. Currently, CoreComm must pull every CSR post-install and compare it to the EDI order for a match. While Ameritech should perform a quality check on service orders, the Post Order status function would help CLECs track the accuracy of order completion.

In Section III.D., Maintenance and Repair, MLT should be available for a loop without port.   Also, SBC/Ameritech indicates that the Maintenance and Repair GUI Activity Duration window will be enhanced to show billing for dispatch. CoreComm is concerned that this may exacerbate the current problem of bill reconciliation for billable hours incurred for dispatches made in error. CoreComm requests that the FMO include the ability to contest these charges from the MLT GUI**.**

In Section III.E., Billing – Bill Data Tape, the need for billing to be treated in the Change Management Process, or separate forum is once again highlighted . SBC/Ameritech is identifying the possibility of changes to billing OSS in this Plan of Record, but the change management process for those changes are not being addressed anywhere. SBC/Ameritech should affirmatively identify where that change management process will be addressed.

Respectfully Submitted,

CORECOMM ILLINOIS, INC.

By:_____
Thomas J. O'Brien
CoreComm Illinois, Inc.
450 West Wilson Bridge Rd.
Worthington, Ohio   43085
(614)430-5101

CERTIFICATE OF SERVICE

The undersigned attorney for CoreComm Illinois, Inc., hereby certifies that he caused copies of the attached Comments of CoreComm Illinois, Inc., to be served on each of the parties on the attached service list by depositing such copies in the U.S. Mail, First Class Postage Prepaid on January 21, 2000.

_____
Thomas J. O'Brien

Attorney for
CORECOMM ILLINOIS, INC.